

Restructuring the CERCLA Process for a DOE Superfund Site

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Preparing regulatory documents for hazardous waste sites has proved to be costly when complying with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). At Lawrence Livermore National Laboratory (LLNL) in Livermore, California, we have devised a methodology that will save millions of dollars and shorten the time to initiation of cleanup. In 1994, we completed a Site-Wide Remedial Investigation report for LLNL's Site 300 experimental test site. The next step in the CERCLA process would have required us to prepare complete Feasibility Studies, Proposed Plans, Records of Decision (RODs), and Remedial Action Implementation Plans for three Operable Units (OUs). In close consultation with the State and Federal regulatory agencies, we have instead created a model strategy to conduct Removal Actions to remove the threat of future releases to the environment, prepare ground water monitoring plans, prepare contingency plans, and incorporate the Removal Actions into the Site-Wide ROD. This process will substitute relatively short documents describing Removal Actions, monitoring, and contingencies for the much longer studies and plans currently required. With this approach, potential sources of future releases will be remediated, low risk ground water contamination will be monitored, human health and the environment will remain protected, and regulatory requirements for RODs will be met. At the same time, costs will be substantially reduced and the time to initiation of cleanup will be shortened as a result of the reduction in the number of documents required.

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